

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor in interest via merger to National City Bank, successor in interest via merger to Mid America Bank, FSB, successor in interest via merger to EFS Bank,

Plaintiff,

v.

Diamond Team Realty, Inc., an Illinois corporation; Jesus Berreles; Norma L. Berreles; First American Bank, as Trustee Under Trust Agreement Dated August 19, 2008 and known as Trust Number 1-08-121; Beneficiaries of Trust Agreement dated August 19, 2008 and known as Trust Number 1-08-121; Country Homes at Kimball Farms Condominium Association; Giovanni Moran; Virginia Moran; Kingsport Homeowners Association;

Defendants.

Case No. 13 cv01849

Assigned Judge: Matthew F. Kennelly

Magistrate Judge: Susan E. Cox

**MOTION FOR JUDGMENT OF FORECLOSURE AND SALE**

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest via merger to National City Bank, successor in interest via merger to Mid America Bank, FSB, successor in interest via merger to EFS Bank by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Jesus Berreles;

Norma L. Berreles;

First American Bank, as Trustee under Trust Agreement dated August 19, 2008 and known as Trust number 1-08-121;

Beneficiaries of Trust Agreement dated August 19, 2008 and known as Trust Number 1-08-121;

Country Homes of Kimball Farms Condominium Association;

Giovanni Moran;

Virginia Moran; and

Kingsport Homeowners Association

and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion attached hereto as Exhibit "A", and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor in interest  
via merger to National City Bank, successor in interest  
via merger to Mid America Bank, FSB, successor in  
interest via merger to EFS Bank

By: /s/ James D. Major  
One of Its Attorneys

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